

HONORABLE JAMES L. ROBART

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IN UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

ERIC DODGE,

Plaintiff,

vs.

EVERGREEN SCHOOL DISTRICT NO. 114,  
a public corporation; CAROLINE GARRETT,  
an individual; and JANA E GOMES, an  
individual,

Defendants.

Cause No. 3:20-cv-05224-RBL

STIPULATION EXTENDING FRCP  
26(a)(2) EXPERT DISCLOSURE  
DEADLINE TO JANUARY 15, 2021

Note on Motion Calendar:

Date: December 15, 2020  
Without Oral Argument

**I. MOTION**

COME NOW, the parties to this action, by and through their respective attorneys of record, and jointly move the Court to extend the deadline to disclose expert witnesses from December 16, 2020 to January 15, 2021.

**II. BASIS FOR MOTION**

The parties have worked cooperatively and diligently on completing discovery. However, discovery has been made more difficult, and has been slowed, as a result of the

STIPULATION EXTENDING FRCP 26(A)(2)  
EXPERT DISCLOSURE DEADLINE - page 1

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current pandemic. While the parties do not anticipate any difficulty completing all discovery before the discovery cutoff (February 16, 2021), there have been a number of depositions that have only recently been taken, with a few remaining depositions scheduled over the next month. As a result of the foregoing, and the need to provide deposition testimony to experts, the parties need until January 15, 2021 to identify experts. In addition, the parties have agreed to a FRCP 35 psychological examination of Mr. Dodge. Because of the upcoming holiday season, that examination will not take place until January.

### III. STIPULATION

Based upon the foregoing, the parties have stipulated to extend the deadline to disclose their expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2) by January 15, 2021. The parties respectfully request that the Court authorize the same. The parties do not believe that any other deadlines in the scheduling order need to be adjusted or will be impacted by the extension of the expert witness disclosure deadline.

DATED this 15<sup>th</sup> day of December, 2020.

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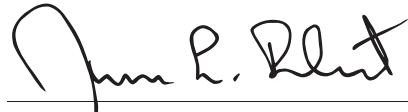
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By: s/ Noah T. Barish  
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**ORDER**

It is so ORDERED. The court reminds the parties that stipulations must include a proposed order. *See* Local Rules W.D. Wash. LCR 7(b)(1); 1(c)(7).

Dated this 16th day of December, 2020.

  
JAMES L. ROBART  
United States District Judge